



Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036-6797  
+1 212 698 3500 Main  
+1 212 698 3599 Fax  
www.dechert.com

---

JONATHAN R. STREETER

jonathan.streeter@dechert.com  
+1 212 698 3826 Direct  
+1 212 314 0049 Fax

November 12, 2019

**VIA ECF**

Hon. Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: *United States v. Nikas, et al.*, 19-cr-716

Dear Judge Cote:

On behalf of Defendant Telemaque Lavidas, we have filed today via ECF a redacted Letter Regarding a Renewed Bail Application (the "Letter") and accompanying exhibits. (Dkt. No. 25). We write to seek the Court's permission to file an unredacted copy of the Letter under seal, to file certain accompanying exhibits (Exs. 1, 7, 8, 20, 21 and 22) to the Letter under seal, and to redact certain portions of the publicly filed Letter and exhibits, in accordance with the Protective Order signed by Your Honor on October 24, 2019 (Dkt. No. 15) and the rules of this Court.

Certain redacted portions of the Letter contain information that the government has designated as "Sensitive Disclosure Materials," that, pursuant to the Protective Order, must be filed under seal. In addition, other portions of the Letter and the exhibits that we propose to redact or file under seal contain information that is subject to non-disclosure agreements, is sensitive personal information (such as tax returns or information about family assets), or contains non-public business information.

Accompanying this letter is a proposed order granting Mr. Lavidas's request to file these documents under seal and to redact certain portions of the Letter and exhibits to be filed publicly on November 12, 2019.

Separately we are providing Your Honor's chambers and the government un-redacted copies of the letter and exhibits and copies of the sealed exhibits.

Dechert  
LLP

November 12, 2019  
Page 2

Respectfully submitted,



Jonathan R. Streeter

JRS

cc: AUSAs Richard Cooper and Daniel Tracer